

Message

From: Bromley, Eugene [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=17F71E77A97E4D82A6623E3063633135-EBROMLEY]
Sent: 8/22/2019 4:18:03 PM
To: Yarde, Richard [richard.yarde@boem.gov]
CC: Goldsmith, Sara [Goldsmith.Sara@epa.gov]
Subject: RE: [EXTERNAL] Early Draft OCS General Permit and Fact Sheet
Attachments: Beacon West comments on Draft CAG 280000_July 2019.pdf; Beta Offshore Comment Letter on Draft OCS General Permit.pdf; DCOR Comments.pdf; LTS 2019 Permit review (file EPA2019 NPDES PermitPOOI) POOI Revised 07222019.docx; OOC - Region 9 NPDES CAG280000 Permit Comments - 07.25.2019.pdf

Richard,

How about a call next week some time? Perhaps Tuesday, Wednesday or Thursday afternoon (Wednesday only until 3:30)? I'm free those times.

I also attached the comments we got from the permittees on the early draft permit.

Eugene Bromley
NPDES Permits Section (WTR-2-3)
EPA Region 9
75 Hawthorne Street
San Francisco, CA 94105
bromley.eugene@epa.gov
(415) 972-3510
(415) 947-3549 (fax)

From: Yarde, Richard <richard.yarde@boem.gov>
Sent: Wednesday, August 21, 2019 1:38 PM
To: Bromley, Eugene <Bromley.Eugene@epa.gov>
Subject: Re: [EXTERNAL] Early Draft OCS General Permit and Fact Sheet

Hi again Eugene,

Sorry this reply took so long, it took a minute to track down the right people and I was out of the office on vacation for a while.

The 500 bbl/day comes from technical experts who contributed to the EA and who had information on past practices. The number is specifically tied to the capacity of the pumps that are used, as well as engineer recommendations on pump pressure and how to optimize flow back and cleanup during the completion. I understand that this was a conservative estimate and it was based not just on past experiences but also specific to the geologic formations (Repetto) here in Southern California. So it is a conservative estimate made by our technical experts and most applicable to our regional circumstances.

I hope this information is helpful for you.

Any further thoughts on pulling together a call? BOEM is still open to participating (again, with the caveat that matters related to litigation could not be part of the conversation).

Rick Yarde
Regional Supervisor, Office of Environment

Pacific Region, Bureau of Ocean Energy Management
805.384.6379
richard.yarde@boem.gov

Find information on BOEM's science at these links

<http://www.boem.gov/Pacific-Studies/>
<https://www.facebook.com/BureauOfOceanEnergyManagement>
<https://www.flickr.com/photos/boemgov/>
https://twitter.com/BOEM_DOI

On Thu, Jul 25, 2019 at 9:41 AM Bromley, Eugene <Bromley.Eugene@epa.gov> wrote:

Thanks Richard,

In the meantime, I have a question about BOEM's 2016 PEA on well stimulation treatments.

On page 4-39, the PEA assumes an initial recovery rate of well treatment fluids of 500 bbl/day. How did you get that number? It appears you may have started with the injected volumes in Table 4-16 and assumed something. But what?

Thanks.

Eugene Bromley
NPDES Permits Section (WTR-2-3)
EPA Region 9
75 Hawthorne Street
San Francisco, CA 94105
bromley.eugene@epa.gov
(415) 972-3510
(415) 947-3549 (fax)

From: Yarde, Richard [<mailto:richard.yarde@boem.gov>]
Sent: Thursday, July 25, 2019 8:55 AM
To: Bromley, Eugene <Bromley.Eugene@epa.gov>
Subject: Re: [EXTERNAL] Early Draft OCS General Permit and Fact Sheet

Hi Eugene - thanks for forwarding this. We are certainly open to a call to discuss. Given that we are still in litigation with some parties (including the State) on well stimulation, I asked my management chain and our attorneys whether they see any problem with us engaging. I am waiting for the answer and will let you know, but in the meantime I think

we can assume that BOEM is open to participation in a call. Thanks again, and I look forward to talking to you.

Rick Yarde

Regional Supervisor, Office of Environment

Pacific Region, Bureau of Ocean Energy Management

805.384.6379

richard.yarde@boem.gov

Find information on BOEM's science at these links

<http://www.boem.gov/Pacific-Studies/>

<https://www.facebook.com/BureauOfOceanEnergyManagement>

<https://www.flickr.com/photos/boemgov/>

[https://twitter.com/BOEM DOI](https://twitter.com/BOEM_DOI)

On Tue, Jul 23, 2019 at 4:17 PM Bromley, Eugene <Bromley.Eugene@epa.gov> wrote:

Kate/James/David/Richard,

Attached is a pre-public notice draft general permit and fact sheet for OCS oil and gas facilities in Region 9. This permit would replace the existing general permit No. CAG280000 that became effective in early 2014.

Also attached are spreadsheets for calculating reasonable potential for specific chemicals and whole effluent toxicity for produced water discharges, and for chlorine in cooling water/fire control system water discharges. In addition, there is an attached spreadsheet that updates the 2006 reasonable potential calculations for produced water using 2019 recommended marine water quality criteria in place of the criteria recommended in 2006.

We provided these items to industry (and EPA HQ) for comment several weeks ago in the hopes of ironing out major issues as best we can; that review period is nearly over.

Now we would also like to share with the CCC, BSEE and BOEM to try to reach agreement on suitable requirements before going much further with permit reissuance.

After you've had a chance to review, perhaps we could set up a meeting or a conference call to discuss further.

Thank you for your cooperation in this matter.

Eugene Bromley

NPDES Permits Section (WTR-2-3)

EPA Region 9

75 Hawthorne Street

San Francisco, CA 94105

bromley.eugene@epa.gov

(415) 972-3510

(415) 947-3549 (fax)